

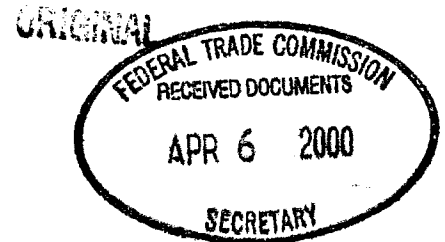
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March 31, 2000



Secretary
Federal Trade Commission
Room H-159, 600 Pennsylvania Ave, N.W.
Washington, D.C. 20580

Re: Gramm-Leach-Bliley Act Privacy Rule,
16 CFR Part 313 -Comment

To Whom It May Concern:

I am writing to express my exasperated concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As a licensed private investigator in the State of Texas and a business owner, I fear we would lose a very necessary and valuable source of locating witnesses and suspects if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It was my impression that the clear intent of Congress was to provide an opportunity for customers of financial institutions to "opt-out" of sharing their personal financial information with non-affiliates of the institutions. The statute provides protection for financial information...not mere names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what is "public"? Congress seemed to be offering a distinction by describing financial information. I believe the Act provides opt-out of information regarding credit history, employment and financial assets. However, name, address, and telephone number should not be classified as "non-public."

Private investigators play an important role in our civil and criminal justice systems, which is not understood by many. We are authorized by courts to serve process by the District Courts of Harris County Civil Trial Division, licensed by the State of Texas to investigate, and held to a higher standard of moral integrity and operation by federal and state laws.

The following paragraphs excerpted from Vernon's Civil Statutes Art. 4413(29bb). Private Security Act, SUBCHAPTER A. GENERAL PROVISIONS details that any person who:

(3) "Investigations company" means:

(A) any person who engages in the business or accepts employment to obtain or furnish information with reference to:

(i) crime or wrongs done or threatened against the United States of America or any state or territory of the United States of America;

(ii) the identity, habits, conduct, business, occupation, honesty, integrity, credibility, knowledge, trustworthiness, efficiency, loyalty, activity, movement, whereabouts, affiliations, associations, transactions, acts, reputation, or character of any person;

(iii) the location, disposition, or recovery of lost or stolen property;

(iv) the cause or responsibility for fires, libels, losses, accidents, damages, or injuries to persons or to property;

(v) the securing of evidence to be used before any court, board, officer, or investigating committee; or

(vi) the electronic tracking of the location of any individual or motor vehicle other than for criminal justice purposes by or on behalf of a governmental entity; or

(B) any person who engages in the business of or accepts employment to protect one or more individuals from bodily harm through the use of a personal protection officer.

must be licensed as an investigator.

The information we obtain regarding addresses and telephone numbers is essential to our conduct of business and fulfilling our obligations to consumers. We utilize this information to investigate embezzlement, insurance fraud, locate delinquent child support debtors, acts of wrongdoing, as well as serve process, and locate witness for civil and criminal proceeding. Criminals, Stalkers, and fraud artists seldom reside where their driver license or vehicles are registered, so current address information is essential. The law enforcement community does not have the manpower to develop most of these cases for prosecution. The largest percentage of users of private investigator services is federal and state governments, attorneys, and businesses.